

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

UNITED STATES OF AMERICA,)	Criminal No: 3:17-cr-640-MGL
)	
Plaintiff,)	
)	
vs.)	
)	
JAMES DENNIS SMITH, JR.)	
BRYON RYE)	
CARL RYE)	
COURTNEY HENRY)	
CHRISTOPHER DAUGHTERY)	
a/k/a "Napa")	
a/k/a "Robin")	
STEVEN MERLO)	
a/k/a "Big Man")	
)	
Defendants.)	

**GOVERNMENT'S THIRD BILL OF PARTICULARS FOR
FORFEITURE OF PROPERTY**

The United States provides the following Third Bill of Particulars regarding property alleged in the Superseding Indictment filed January 2, 2018, as also being subject to forfeiture to the United States.

NOTICE IS HEREBY GIVEN that upon conviction of the Defendants for felony violations of Title 18 and Title 21, United States Code, as charged in the Indictment, the United States intends to seek the forfeiture of all of the Defendants' right, title and interest in and to any property, real and personal, constituting or derived from any proceeds the Defendant obtained, directly or indirectly, as the result of such violations of Title 18 and Title 21, United States Code, and all property traceable to such property; or used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violations of Title 18 and Title 21, United States Code, pursuant to Title 18, United States Code, Sections 924(d) and 982(a)(1), Title 21 United

States Code, Sections 853 and 881, and Title 28, United States Code, Section 2461(c), or equivalent substitute property pursuant to 21 U.S.C. § 853(p). Such property includes, but is not limited to the following:

1. Cash/US Currency:

- (1) \$14,073.00 in U.S. Currency seized on January 17, 2018
Seized from: Steven Charles Merlo
Asset ID: 18-DEA-637951
- (2) \$409,005.00 in U.S. Currency seized on January 17, 2018
Seized from: Christopher Robert Daugherty
Asset ID: 18-DEA-638080

2. Firearms:

- (1) Glock 21 .45 Caliber Pistol
Serial No.: TUB043
Seized from: Charles Steven Merlo
Asset ID: 18-DEA-638386
- (2) Smith and Wesson 638 Airweight .38 Caliber Revolver
Serial No.: CWR1115
Seized from: Charles Steven Merlo
Asset ID: 18-DEA-638386
- (3) Para-Ordnance P14 .45 Caliber Pistol
Serial No.: RL4730
Seized from: Charles Steven Merlo
Asset ID: 18-DEA-638386
- (4) Glock 34 .9mm Caliber Pistol
Serial No.: BFUL089
Seized from: Charles Steven Merlo
Asset ID: 18-DEA-638386
- (5) Stag Arms STAG-15 .223 Caliber Auto-Loading Rifle
Serial No.: S026857
Seized from: Charles Steven Merlo
Asset ID: 18-DEA-638386

- (6) Charles Daly 500 12 Gauge Double Barrell Shotgun
Serial No.: 191327
Seized from: Charles Steven Merlo
Asset ID: 18-DEA-638386

- (7) Mossberg 500A 12 Gauge Slide Action Shotgun
Serial No.: P538013
Seized from: Charles Steven Merlo
Asset ID: 18-DEA-638386

Respectfully submitted,

BETH DRAKE
UNITED STATES ATTORNEY

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Greenville, South Carolina
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